

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

RICHARD EUGENE WARREN,)	
)	
Plaintiff,)	
v.)	Civil Action No. 3:23-cv-00719-DJN
)	
)	
MAHESH ADITYA, SANTANDER)	
CONSUMER HOLDINGS,)	
BRUCE JACKSON, ERIC LANEY,)	
CHRISTOPHER PFIRMAN; and)	
CHRYSLER CAPITAL,)	
)	
Defendants.)	
)	

**DEFENDANTS SANTANDER CONSUMER HOLDINGS AND SANTANDER
CONSUMER USA INC. DBA CHRYSLER CAPITAL’S CORPORATE DISCLOSURE**

Pursuant to Federal Rule of Civil Procedure 7.1(a), Defendants Santander Consumer Holdings¹ and Santander Consumer USA Inc. dba Chrysler Capital (“Defendants”) state that:

1. Santander Consumer USA Inc. is a wholly owned subsidiary of Santander Holdings USA Inc.
2. Santander Holdings USA Inc. is a wholly owned subsidiary of Banco Santander, S.A.
3. Based on public filings, Defendants are not currently aware of any 10% or greater shareholder of Banco Santander, S.A.

¹ It is unclear what entity Plaintiff intended to name with Santander Consumer Holdings. For the purposes of this Disclosure, Defendants assume Plaintiff is referring to Santander Holdings USA Inc.

These representations are made to enable the Court to evaluate possible disqualification or
recusal.

Dated: November 28, 2023

Respectfully submitted,

**Santander Holdings USA Inc. and
Santander Consumer USA Inc.**

/s/ Katherine E. Lehn

Katherine E. Lehn (VSB 92357)

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Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on November 28, 2023, I electronically filed this document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record. And I certify that I will mail the document by U.S. Mail to the following non-filing user:

Richard Eugene Warren
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Plaintiff, Pro Se

/s/ Katherine E. Lehn
Katherine E. Lehn

Counsel for Defendants